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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|-----------------------------------|---|-----------------------------------|
| In re: |) | Bankruptcy Case No. 19-30088 (DM) |
| |) | |
| PG&E CORPORATION, |) | Chapter 11 |
| |) | |
| and |) | (Lead Case) |
| |) | |
| PACIFIC GAS AND ELECTRIC COMPANY, |) | (Jointly Administered) |
| |) | |
| |) | NOTICE OF APPEARANCE AND |
| Debtors. |) | REQUEST FOR SPECIAL NOTICE |

PLEASE TAKE NOTICE that Pacific Mobile Structures, Inc., creditor and party in interest in the above-captioned bankruptcy case (the "Bankruptcy Case"), by and through its counsel, Lane Powell PC, hereby enters this appearance pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and requests that the counsel listed below be added to the official mailing matrix, CM/ECF, and service lists in the Bankruptcy Case. Pacific Mobile Structures, Inc. requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in the Bankruptcy Case, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, and all other matters arising herein or in any way related to the Bankruptcy Case, including in adversary proceedings, be given and served upon Lane Powell PC at the following address:

NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE – PAGE

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request applies to and includes not only the notices and papers referenced in the Bankruptcy Rules and Bankruptcy Code, but also includes, without limitation, all orders, notices and pleadings relating to any application, motion, petition, objection, pleadings, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, telephone, courier services, hand delivery, facsimile transmission, electronic mail, telex or otherwise that (i) affects, or seeks to affect, or may potentially affect in any way, any rights or interest of any creditor or party-in-interest in this case; (ii) affects, or seeks to affect (a) the above-captioned Debtor and/or its estate or (b) property or proceeds thereof in the possession, custody, or control of others that any of the Debtor or its estate may seek to use; or (iii) requires or seeks to require any act, delivery of any property, payment or other conduct by Pacific Mobile Structures, Inc.

PLEASE TAKE FURTHER NOTICE that Pacific Mobile Structures, Inc. does not, by filing this Notice of Appearance and Request for Special Notice nor any subsequent appearance, pleading, claim or suit, submit to the jurisdiction of the Bankruptcy Court or intend that this Notice of Appearance and Request for Special Notice constitute a waiver of any of its rights: (i) to have final orders in non-core matters entered only after de novo review by a District Judge; (ii) to trial by jury in any proceedings so triable in this case, or any controversy or proceeding related to this case; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary

1 withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs or recoupments, which Pacific
2 Mobile Structures, Inc. expressly reserves.

3 DATED this 20th day of February, 2019.

4
5 LANE POWELL PC

6
7 By /s/ Brad T. Summers

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NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE – PAGE 3

PROOF OF SERVICE
1013A (3) CCP Revised 1/1/88

I, Brad T. Summers, declare as follows:

I am a citizen of the United States and employed in Multnomah County, Oregon. I am over the age of eighteen years and not a party to the within action. My business address is: Lane Powell PC, 601 SW Second Avenue, Suite 2100, Portland, Oregon 97204-3158.

I am familiar with Lane Powell PC's practice whereby each document is placed in an envelope, sealed, postage is placed thereon, and the sealed envelope is placed in the office mail receptacle. The mail is collected and deposited in a United States Postal mailbox at or before the close of business each day.

On February 20, 2019, I served the following document(s):

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE

on the parties in this action by placing ☐ the original and/or ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

- ☒ **(BY CM/ECF)** By electronically filing a true copy thereof with the Court's CM/ECF system, which sends a notice of electronic filing (NEF) to the recipients as addressed below:

SEE ATTACHED SERVICE LIST.

- ☒ **(BY REGULAR MAIL)** By placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the designated area for outgoing mail at Portland, Oregon, addressed as set forth below:

SEE ATTACHED SERVICE LIST.

- ☐ (STATE) I declare under penalty of perjury under the laws of the State of Oregon that the above is true and correct to the best of my knowledge.
- ☒ (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on February 20, 2019.

/s/ Brad T. Summers
Brad T. Summers

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